

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

UNITED STATES OF AMERICA ex rel.)	
JOSHUA HARMAN,)	
)	Civil Action No. 2:12-CV-89
Plaintiff,)	
)	
v.)	
)	
TRINITY INDUSTRIES, INC, and)	
TRINITY HIGHWAY PRODUCTS, LLC,)	
)	
Defendants.)	

**RENEWED MOTION TO INTERVENE OF THE CENTER FOR AUTO SAFETY
AND THE SAFETY INSTITUTE**

For the reasons set forth in the accompanying Brief in Support of Renewed Motion to Intervene, the Center for Auto Safety and The Safety Institute respectfully ask this Court to permit them to intervene in the above-captioned case under Fed. R. Civ. P. 24(b) for the limited purpose of seeking to unseal documents filed in the case. A proposed order is attached.

Respectfully submitted,

/s/ Leslie A. Brueckner
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served on counsel for all parties via the Court's CM/ECF system on this 21st day of November, 2014.

/s/ Leslie A. Brueckner
Leslie A. Brueckner

CERTIFICATE OF CONFERENCE

I hereby certify that I, counsel for the Center for Auto Safety and The Safety Institute has complied with Local Rule CV-7(H) and conferred with counsel for Plaintiff and Defendants by telephone and by email on November 19, 2014 concerning this Renewed Motion to Intervene. Counsel for Plaintiff, Teresa Monroe, indicated that Plaintiffs agree with the merits of this motion. Counsel for the Trinity Defendants, Heather B. New, indicated that the Trinity Defendants are opposed to the Renewed Motion to Intervene. Accordingly, the parties are unable to reach an agreement on the merits of the Motion to Intervene and the Court's intervention is necessary.

/s/ Leslie A. Brueckner
Leslie A. Brueckner